

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
OF OKLAHOMA

TRAVIS FUNK,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CIV-12-1159-HE
)	
FARMERS INSURANCE COMPANY,)	
INC., a foreign corporation, FARMERS)	
INSURANCE EXCHANGE, a foreign)	
corporation, and FARMERS NEW)	
WORLD LIFEINSURANCE COMPANY)	
)	
)	
Defendants.)	

NOTICE OF REMOVAL

1. Farmers Insurance Company, Inc. ("FICO"), Farmers Insurance Exchange ("FIE") and Farmers New World Life Insurance Company ("FNWL") are Defendants in a civil action brought against them by in the District Court of Oklahoma County, State of Oklahoma, and titled, *Travis Funk vs. Farmers Insurance Company, Inc., et al.* Case Number CJ-2012-5632.

2. At the time of filing this action and at the present time, Plaintiff is a resident and citizen of Oklahoma County, State of Oklahoma. (*See* Petition, attached hereto as Exhibit "1" at ¶ 1).

3. At the time of the filing of this action and at the present time, FICO was and is a corporation duly organized and existing under the laws of the State of Kansas, with its principal place of business in Kansas; it is not a citizen of Oklahoma.

4. At the time of the filing of this action and at the present time, FIE was and is an insurance exchange duly organized and existing under the laws of the State of California, with its principal place of business in California; it is not a citizen of Oklahoma.

5. At the time of the filing of this action and at the present time, FNWL was and is a corporation duly organized and existing under the laws of the State of Washington, with its principal place of business in Washington; it is not a citizen of Oklahoma.

6. In his Petition, Plaintiff claims to be entitled to recover the sum of \$250,000 and, therefore, the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

7. This is the kind of action of which the United States District Courts have original jurisdiction because of diversity of citizenship and sufficiency of amount in controversy.

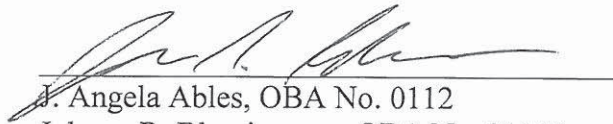
8. The aforementioned action was commenced by service of summons upon the Oklahoma Insurance Commissioner, on or about September 20, 2012, and this Notice of Removal is, therefore, timely filed under the provisions of 28 U.S.C. § 1446.

9. Copies of all process, pleadings and orders filed or served upon Defendant in the aforementioned state action along with a copy of the docket sheet of the case are attached hereto, marked Exhibits "1" through "8" and made a part hereof.

10. Defendants consent to removal of this action from the District Court of Oklahoma County, Oklahoma.

11. Simultaneous with the filing of this Notice of Removal, Defendants have served Filing Notice of Removal on all counsel of record and the Clerk of the District Court of Oklahoma County, Oklahoma.

Respectfully submitted,

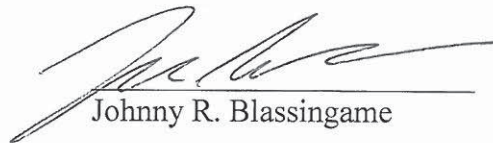


Angela Ables, OBA No. 0112
Johnny R. Blassingame, OBA No. 21110
KERR, IRVINE, RHODES & ABLES
201 Robert S. Kerr, Ave. Suite 600
Oklahoma City, OK 73102
(405) 272-9221; Fax (405) 236-3121
aables@kiralaw.com
jblassingame@kiralaw.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on the 22nd day of October, 2012, a true and correct copy of said Notice of Removal was served upon the above-named parties, by mailing said copies to the parties' attorneys of record and further that a copy of said Notice of Removal was hand delivered to the Court Clerk of Oklahoma County, Oklahoma, for filing.



Johnny R. Blassingame